UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 26 2018

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John Kovaleski, Plant Manager
PPG Industries, Inc.
10800 S. 18th Street
Oak Creek, Wisconsin 53154

Re: Notice and Finding of Violation
PPG Industries, Inc.
Oak Creek, Wisconsin

Dear Mr. Kovaleski:

The U.S. Environmental Protection Agency is issuing the enclosed Notice and Finding of Violation (NOV/FOV) to PPG Industries, Inc. (PPG or you) under Section 113(a) of the Clean Air Act, 42 U.S.C. § 7413(a). We find that you are violating your Title V operating permit, the Wisconsin State Implementation Plan and the National Emission Standards for Organic Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing and for Miscellaneous Coating Manufacturing found at 40 C.F.R. Subparts FFFF and HHHHH, respectively, at your Oak Creek, Wisconsin facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV/FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the NOV/FOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Luke Hullinger. You may call him at (312) 886-3011 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

Edward Nam
Director
Air and Radiation Division

Enclosure

cc: Michael Szabo, Wisconsin Department of Natural Resources
Kendra Fisher, Wisconsin Department of Natural Resources

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	
	)	
PPG Industries, Inc.	)	**NOTICE AND FINDING**
Oak Creek, Wisconsin	)	**OF VIOLATION**
	)	
Proceedings Pursuant to	)	**EPA-5-18-WI-05**
the Clean Air Act,	)	
42 U.S.C. §§ 7401 et seq.	)	
	)	

NOTICE AND FINDING OF VIOLATION

The U.S. Environmental Protection Agency (EPA) is issuing this Notice and Finding of Violation (NOV/FOV) under Section 113(a) of the Clean Air Act (CAA), 42 U.S.C. § 7413(a). EPA finds that PPG Industries, Inc. (PPG) is violating the conditions of its Title V Operating Permit, the Wisconsin State Implementation Plan (SIP), the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing at 40 C.F.R. Part 63, Subpart FFFF, and the NESHAP for Miscellaneous Coating Manufacturing at 40 C.F.R. Part 63, Subpart HHHHH at your Oak Creek, Wisconsin facility (the Facility) as follows:

Regulatory Authority

Title V Permit Program

1. Title V of the CAA, 42 U.S.C. §§ 7661-7661f, establishes an operating permit program for major sources of air pollution.

2. In accordance with Section 502(b) of the CAA, 42 U.S.C. § 7661a(b), the EPA promulgated regulations establishing the minimum elements of a Title V permit program to be administered by any air pollution control agency. *See* 57 Fed. Reg. 32295 (July 21, 1992). Those regulations are codified at 40 C.F.R. Part 70.

3. Section 502(d) of the CAA, 42 U.S.C. § 7661a(d), provides that each state must submit to the EPA a permit program meeting the requirements of Title V.

4. On November 30, 2001, EPA granted Wisconsin final approval of its Title V CAA Permit Program, effective November 30, 2001. 66 Fed. Reg. 62951. *See also* 40 C.F.R. Part 70, Appendix A.

5. On February 28, 2006, EPA granted Wisconsin final approval on revisions to its Title V CAA Permit Program, effective March 30, 2006. 71 Fed. Reg. 9934.

6. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of

the CAA, no source subject to Title V may operate except in compliance with a Title V permit.

Title V Operating Permit

7. On July 29, 2013, the Wisconsin Department of Natural Resources (WDNR) issued to PPG the Title V Operating Permit Number 241014620-P12 (Title V Permit).

8. Title V Permit Section I.A.3 describes the compliance requirements of Subpart HHHHH applicable to the coating manufacturing operations at the Facility, including those described in Paragraphs 39 – 45, below.

9. Title V Permit Section I.B.3 describes the compliance requirements of Subpart FFFF applicable to the synthetic resin manufacturing operations at the Facility, including those described in Paragraphs 26 – 36, below.

10. Title V Permit Section I.F.3 describes the compliance requirements of Subpart FFFF applicable to the above group storage tank farm at the Facility, including those described in Paragraphs 26 – 31 and 37 – 38, below.

Wisconsin State Implementation Plan

11. On January 18, 1995, EPA approved Wisc. Admin. Code Chapter NR 407 as part of the federally enforceable SIP for Wisconsin. 60 Fed. Reg. 3543.

12. The Wisconsin SIP, at Wisc. Admin. Code § NR 407.09(1)(f), states that a permittee has a duty to comply with all conditions of an operation permit.

13. The Wisconsin SIP, at Wisc. Admin. Code § NR 407.09(3), states that all terms and conditions in an operation permit, including any provisions designated to limit a stationary source's potential to emit, are enforceable by the EPA Administrator under Section 113(a) of the CAA, 42 U.S.C. § 7413(a).

14. The Wisconsin SIP, at Wisc. Admin. Code § NR 407.09(1)(f)(1), provides that any noncompliance with the operation permit constitutes a violation of the Wisconsin SIP and is grounds for enforcement action, permit suspension, revocation or revision, or, if applicable, under Wisc. Admin. Code § NR 144.3925(6), denial of a permit renewal application.

National Emission Standards for Hazardous Air Pollutants

15. Section 112 of the CAA, 42 U.S.C. § 7412, requires the EPA to promulgate a list of all categories and subcategories of new and existing "major sources" and "area sources" of hazardous air pollutants (HAP) and establish emissions standards for the categories and subcategories. These emission standards are known as the NESHAP. The EPA codified these standards at 40 C.F.R. Parts 61 and 63.

16. "Major source" is defined as "any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants." 42 U.S.C. § 7412(a)(1).

17. "Area source" is defined as "any stationary source of hazardous air pollutants that is not a major source." 42 U.S.C. § 7412(a)(2).

18. "Stationary source" is defined as "any building, structure, facility, or installation, which emits or may emit any air pollutant." 42 U.S.C. § 7411(a)(3).

19. "Hazardous air pollutant" is defined as "any air pollutant listed in or pursuant to [Section 112(b) of the CAA]." 42 U.S.C. § 7412(a)(6).

20. Section 112(i)(3) of the CAA, 42 U.S.C. § 7412(i)(3), prohibits any person subject to a NESHAP from operating a source in violation of a NESHAP after its effective date. *See also* 40 C.F.R. §§ 61.05 and 63.4.

21. The NESHAP at 40 C.F.R. Part 63, Subpart A, includes general provisions applicable to the owner or operator of any stationary source that contains an affected facility subject to the NESHAP at Part 63. These include definitions at 40 C.F.R. § 63.2.

22. The NESHAP at 40 C.F.R. § 63.2 defines "existing source" as any affected source that is not a new source.

23. The NESHAP at 40 C.F.R. § 63.2 defines "new source" any affected source the construction or reconstruction of which is commenced after EPA first proposes a relevant emission standard under 40 C.F.R. Part 63 establishing an emission standard applicable to such source.

24. The NESHAP at 40 C.F.R. § 63.2 defines "fugitive emissions" as those emissions from a stationary source that could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening. Under Section 112 of the CAA, all fugitive emissions are to be considered in determining whether a stationary source is a major source.

25. The NESHAP at 40 C.F.R. § 63.6(e) states:

> At all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the owner or operator reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require

the owner or operator to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the startup, shutdown, and malfunction plan required in paragraph (e)(3) of this section), review of operation and maintenance records, and inspection of the source.

Miscellaneous Organic Chemical Manufacturing NESHAP

26. On November 10, 2003, EPA promulgated the NESHAP for Miscellaneous Organic Chemical Manufacturing, codified at 40 C.F.R. Part 63, Subpart FFFF (Subpart FFFF). 68 Fed. Reg. 63888. Subpart FFFF establishes emission standards, requirements to demonstrate initial and continuous compliance with emission limits, operating limits, work practice standards, and recordkeeping requirements associated with miscellaneous organic chemical manufacturing. *See* 40 C.F.R. § 63.2430.

27. Subpart FFFF at 40 C.F.R. § 63.2445(b) provides that owners and operators of existing sources subject to Subpart FFFF must comply with the requirements for existing sources no later than May 10, 2008.

28. Subpart FFFF at 40 C.F.R. § 63.2435(a) provides that owners and operators are subject to the Subpart FFFF if they operate miscellaneous organic chemical manufacturing process units (MCPU) that are located at, or are part of, a major source of HAP emissions as defined in Section 112(a) of the CAA.

29. Subpart FFFF at 40 C.F.R. § 63.2550 defines "miscellaneous organic chemical manufacturing process" as all equipment which collectively functions to produce a product or isolated intermediate that is "material" as that term is described in 40 C.F.R. § 63.2435(b). Process includes any, all or a combination of reaction, recovery, separation, purification, or other activity, operation, manufacture, or treatment which are used to produce a product or isolated intermediate.

30. Subpart FFFF at 40 C.F.R. § 63.2435(b) provides that a MCPU includes equipment necessary to operate a miscellaneous organic chemical manufacturing process that, among other things, processes, uses or generates any of the organic HAPs listed in Section 112(b) of the CAA. A MCPU also includes any assigned storage tanks and transfer racks; equipment in open systems that is used to convey or store water having the same concentration and flow characteristics as wastewater; and equipment such as pumps, compressors, agitators, pressure relief devices, sampling connection systems, open ended valves or lines, valves, connectors, and instrumentation systems that are used to manufacture any material or family, including but not limited to an organic chemical with an SIC code listed in 40 C.F.R. § 63.2435(b)(1)(i).

31. Subpart FFFF at 40 C.F.R. § 63.2550 defines "in organic HAP service" to mean a piece of equipment that either contains or contacts a fluid (liquid or gas) that is at least 5 percent by weight of total organic as determined according to Method 18 of 40 C.F.R. Part 60, Appendix A. *See also* 40 C.F.R. § 63.180(d)(1).

32. Subpart FFFF at 40 C.F.R. § 63.2480 and Table 6 list the requirements for leaks for equipment that is in organic HAP service, and includes the standards set forth in the National Emission Standards for Equipment Leaks, Control Level 2 Standards, at 40 C.F.R. Part 63 Subpart UU (Subpart UU).

33. Subpart UU at 40 C.F.R. § 63.1023(b) provides that monitoring shall comply with Method 21, of 40 C.F.R. Part 60, Appendix A.

34. Subpart UU at 40 C.F.R. § 63.1026(b)(4) requires weekly visual inspections of pumps. Specifically, 40 C.F.R. § 63.1026(b)(4) states:

> Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. The owner or operator shall document that the inspection was conducted and the date of the inspection. If there are indications of liquids dripping from the pump seal at the time of the weekly inspection, the owner or operator shall follow the procedure specified in either paragraph (b)(4)(i) or (b)(4)(ii) of [40 C.F.R. § 63.1026].

35. Subpart UU at 40 C.F.R. § 63.1023(b)(2) provides:

> Detection instrument performance criteria. (i) Except as provided for in paragraph (b)(2)(ii) of [40 C.F.R. § 63.1023], the detection instrument shall meet the performance criteria of Method 21 of 40 CFR part 60, appendix A, except the instrument response factor criteria in section 3.1.2, paragraph (a) of Method 21 shall be for the representative composition of the process fluid not each individual [volatile organic chemical (VOC)] in the stream. For process streams that contain nitrogen, air, water or other inerts that are not HAP or VOC, the representative stream response factor shall be determined on an inert-free basis. The response factor may be determined at any concentration for which monitoring for leaks will be conducted.

36. Subpart UU at 40 C.F.R. § 63.1023 (b)(1) states that:

> Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in [40 C.F.R.] §§ 63.1021(b), 63.1036, 63.1037, and paragraphs (c) and (d) of [40 C.F.R. § 63.1023]. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance. The operational

provisions of paragraphs (b)(2) and (b)(3) of [40 C.F.R. § 63.1023] also apply.

37. Subpart FFFF at 40 C.F.R. § 63.2470(a) states that "[y]ou must meet each emission limit in Table 4 to [Subpart FFFF] that applies to your storage tanks, and you must meet each applicable requirement specified in paragraphs (b) through (e) of [40 C.F.R. § 63.2470]."

38. Subpart FFFF at Table 4 requires Group 1 Tanks to "[r]educe total HAP emissions by ≥95 percent by weight or to ≤20 ppmv of TOC or organic HAP and ≤20 ppmv of hydrogen halide and halogen HAP by venting emissions through a closed vent system to any combination of control devices."

Miscellaneous Coating Manufacturing NESHAP

39. On December 11, 2003, EPA promulgated the NESHAP for Miscellaneous Coating Manufacturing, codified at 40 C.F.R. Part 63, Subpart HHHHH (Subpart HHHHH). 68 Fed. Reg. 69185. Subpart HHHHH establishes emission standards, requirements to demonstrate initial and continuous compliance with emission limits, operating limits, work practice standards, and recordkeeping requirements associated with miscellaneous coating manufacturing. *See* 40 C.F.R. § 63.7980.

40. Subpart HHHHH at 40 C.F.R. § 63.7995(b) provides that owners and operators of existing sources subject to Subpart HHHHH must comply with the requirements no later than December 11, 2006.

41. Subpart HHHHH at 40 C.F.R. § 63.7985 provides that owners and operators are subject to Subpart HHHHH if they operate miscellaneous coating manufacturing process units that are located at, or are part of, a major source of HAP emissions as defined in Section 112(a) of the CAA.

42. Subpart HHHHH at 40 C.F.R. § 63.8005(a) states that "[y]ou must meet each emission limit and work practice standard in Table 1 to this subpart that applies to you, and you must meet each applicable requirement specified in §63.8000(b), except as specified in paragraphs (a)(1)(i) and (ii) of [40 C.F.R. § 63.8005]."

43. Subpart HHHHH at Table 1 states:

> For each Stationary process vessel at an existing source [y]ou must [e]quip the vessel with a cover or lid that must be in place at all times when the vessel contains a HAP, except for material additions and sampling; or [c]onsidering both capture and any combination of control (except a flare), reduce emissions of organic HAP with a vapor existing pressure ≥0.6 kPa by ≥75 percent by weight, and reduce emissions of organic HAP with a vapor pressure <0.6 kPa by ≥60 percent by weight.

44. Subpart HHHHH at 40 C.F.R. § 63.7980(a) states that "[y]ou must meet each requirement in Table 4 to this [Subpart HHHHH] that applies to your wastewater streams,

and you must meet each applicable requirement specified in [40 C.F.R.] §63.8000 and paragraphs (b) through (d) of [40 C.F.R. § 63.7980]."

45. Subpart HHHHH at Table 4 states that "[f]or each wastewater tank used to store a Group 1 wastewater stream maintain a fixed roof, which may have openings necessary for proper venting of the tank, such as pressure/vacuum vent or j-pipe vent."

Factual Background and Findings

46. PPG owns and operates the Facility, a coatings and resin manufacturing facility at 10800 South 13th Street, Oak Creek, Wisconsin.

47. The Facility includes resin and paint manufacturing plants that produce resins, paints, and coatings for industrial applications. The chemicals that PPG processes at the Facility include, but are not limited to, methyl isobutyl ketone (MIBK), toluene, xylene, and ethylbenzene, which are all HAPs listed under Section 112(b) of the CAA, 42 U.S.C. § 7412(b).

48. On October 7, 2008, PPG submitted to WDNR a Notification of Compliance Status for Subpart FFFF.

49. The Facility is a major source of HAP emissions, as defined in Section 112(a) of the CAA.

50. EPA conducted a CAA inspection of the Facility from April 30, 2018 to May 3, 2018 (Inspection).

51. PPG owns and operates an MCPU located at the Facility that is a major source of HAP. Thus, PPG owns and operates an MCPU (the resin plant and associated operations) that is subject to Subpart FFFF.

52. PPG operates equipment at the Facility that includes, but is not limited to, pumps, connectors, open-ended lines, valves, and pressure relief devices that operate in HAP service for 300 hours or more during the calendar year, and are therefore subject to standards for equipment leaks pursuant to Table 4 of Subpart FFFF.

53. PPG conducts leak detection and repair (LDAR) on components subject to Subpart FFFF and maintains all LDAR data in an electronic database. PPG provided a copy of its LDAR database to EPA during the Inspection.

54. During the Inspection, EPA conducted LDAR monitoring per EPA Reference Method 21 in the Facility's resin plant.

55. The Facility's resin plant operates on a batch schedule. During the Inspection, EPA coordinated with the process operators to confirm process equipment and storage tanks were in organic HAP service, not under vacuum, and operating under normal conditions, at the time EPA conducted LDAR monitoring per Method 21.

56. During the Inspection the technician that performs LDAR on behalf of PPG stated that PPG does not confirm that the monitored equipment is in VOC/HAP service during the time of inspections in the regular course of business.

57. During the Inspection, EPA detected 4 leaking open-ended lines. Table A shows EPA's open-ended line leak monitoring results during the Inspection:

Table A – Open-Ended Lines Leak Details from Leak Monitoring Results Conducted by EPA During the April 30 – May 3, 2018 Inspection

Tag Number	Location Notes	Component Type	EPA Reading parts per million (ppm)	Confirmation Reading (ppm)
	S Meter Station – MIBK double block and bleed line	Open-ended line	1,100	550
3409	S Meter Station – Amine feed line	Open-ended line	600, Visual drip	
7508	Poly Tank Line	Open-ended line	Visual drip	
	S Meter Station – MIBK feed line	Open-ended line	1,900	1,700

58. On October 7, 2008, PPG submitted a letter to Wisconsin DNR classifying tanks into regulatory groups including classifying Tanks 103-156, Tank 1901, and Tank 1902 as Group 1 Tanks.

59. During the Inspection, EPA detected leaks from several tanks not in the waste treatment area. Table B shows EPA's tank leak monitoring results from the Inspection:

Table B – Leak Monitoring Results in Storage Tanks Not in Waste Treatment Area Conducted by EPA During the April 30 – May 3, 2018 Inspection

Tank Number	Component Type	EPA Reading (ppm)
114	Hatch	4,800
118	Conservation vent	1,400
137	Connector	700
110	Hatch	2,400
147	Conservation vent	550
142	Hatch	550
120	Hatch	1,300

60. During the Inspection EPA detected leaks from several tanks in the waste treatment area. Table C shows EPA's tank leak monitoring results for tanks in the waste treatment area from the Inspection:

Table C – Leak Monitoring Results in Storage Tanks in the Waste Treatment Area Conducted by EPA During the April 30 – May 3, 2018 Inspection

Tank Number	Component Type	EPA Reading (ppm)
1901	Hatch	3,400
1902	Open hatch	Flame out
1903	Unbolted hatch	1,700

61. During the Inspection, PPG explained that during the addition of powder pigments in the paint production process, emissions were rerouted from the paint regenerative thermal oxidizer (RTO) to the to the baghouse in order to maintain the operating life of the RTO.

62. On May 18, 2018, PPG submitted various documents requested by EPA during the Inspection including emissions calculations and specifications for the dust collection filters in the paint manufacturing process.

63. In review of the documentation submitted by PPG, EPA determined that PPG has conducted no assessment of additional VOCs and HAPs caused by rerouting emissions from the RTO to the baghouse during times of powder addition, and that the baghouse manufacturing specifications indicate no control efficiency for VOCs and HAPs.

64. During the Inspection, EPA discovered a high number of leaks at the paint plant mixing vessels' agitators, conservation vents, and hatches. *See* Attachment A, Inspection Report Appendix A, PPG Monitoring Results.

65. On June 13, 2018, PPG provided copies of all pump visual inspections for the time period 2013 to present. Records provided by PPG show only monthly inspections conducted at each pump.

66. During the Inspection, EPA noted an unbolted hatch on the top of Tank 1907, which was identified as the Paint Plant Wastewater Treatment tank. EPA documented concentrations of 2,500 ppm at Tank 1907. EPA also noted an unbolted hatch on top of Tank 1903, which was identified as the Paint Plant/Cationic Wash Water tank. EPA documented concentrations of 1,700 ppm at Tank 1903.[1]

[1] Table C includes these emissions.

Violations

General Provisions Violation

67. PPG failed to operate and maintain their paint production process in a manner consistent with safety and good air pollution control practices for minimizing emissions by rerouting VOC and HAPs emissions from the RTO to the baghouse during times of powder addition, as required by 40 C.F.R. § 63.6(e) as detailed in paragraphs 61 and 63.

Subpart FFFF Violations

68. PPG failed to conduct weekly visual inspections on pumps from 2013 through the present, as required by 40 C.F.R. § 63.1026(b)(4), as detailed in Paragraph 65 above.

69. PPG failed to verify equipment was in organic HAP service prior to monitoring for leaks, as required by 40 C.F.R. § 63.2480(a), Table 6 of Subpart FFFF, and 40 C.F.R. § 63.1023(b)(2), as detailed in Paragraph 55 and 56.

70. PPG failed to seal open-ended lines during operations that did not require process fluid flow or maintenance, as required by 40 C.F.R. §§ 63.2480(a) and 63.1033(b)(1), as detailed in Paragraph 57 and Table A.

71. PPG failed to meet Group 1 storage tank requirements for various storage tanks in the resin plant bulk storage tank farm, as well as the storage tanks in the waste treatment area at the Facility; EPA identified HAP emissions being released to the atmosphere during normal operations, which resulted in failing to reduce HAP emissions by less than or equal to 95 percent, by weight, for each Group 1 storage tank, as required by 40 C.F.R. § 63.2470(a) and Table 4 of Subpart FFFF, as detailed in Paragraphs 58, 59, and Table B.

Subpart HHHHH Violations

72. PPG failed to meet the emission limits, capture and control efficiency requirements for stationary process vessels, as required by 40 C.F.R. § 63.8005(a) and Table 1 of Subpart HHHHH. EPA documented stationary process vessels releasing uncontrolled emissions to the atmosphere under normal operating conditions, as detailed in Paragraph 64.

73. PPG failed to meet the emission limits and work practice standards for wastewater streams, by not maintaining a fixed roof for wastewater tanks used to store Group 1 wastewater streams, as required by 40 C.F.R. § 63.8020(a) and Table 4 of Subpart HHHHH, as detailed in Paragraph 60 and Table C.

Title V Permit Violations

74. The violations of Subpart FFFF described above in paragraphs 68 – 70 are also violations of Section I.B.3 of the Title V Permit.

75. The violations of Subpart FFFF described above in paragraph 71 are also violations of Section I.F.3 of the Title V Permit.

76. The violations of Subpart HHHHH described above in paragraphs 72 and 73 are also violations of Section I.A.3 of the Title V Permit.

Wisconsin SIP Violations

77. PPG's violations of the Title V Permit, described above, are violations of Wisc. Admin. Code § NR 407.09(1)(f) of the Wisconsin SIP.

Environmental Impact of Violations

78. VOC contribute to ozone formation which can result in adverse effects to human health and vegetation. Ozone can penetrate into different regions of the respiratory tract and be absorbed through the respiratory system.

79. HAP emissions can lead to adverse health effects like cancer, respiratory irritation, and damage to the nervous system.

80. Breathing methyl isobutyl ketone for short periods of time can affect the nervous system. The effects can include headaches, dizziness, narcosis, nausea, numbness in the fingers and toes, and (if the exposure is prolonged) unconsciousness, and even death.

81. Short-term exposure to high levels of toluene results first in light-headedness and euphoria, followed by dizziness, sleepiness, unconsciousness, and in some cases death. Long-term exposures at low levels have caused effects to the kidneys.

82. The main effect of inhaling xylene vapor is depression of the central nervous system, with symptoms such as headache, dizziness, nausea and vomiting.

9/26/18
Date

Edward Nam
Director
Air and Radiation Division

CERTIFICATE OF MAILING

I certify that I sent a Notice and Finding of Violation, No. EPA-5-18-WI-05, by Certified Mail, Return Receipt Requested, to:

John Kovaleski, Plant Manager
PPG Industries, Inc.
10800 S. 18th Street
Oak Creek, Wisconsin 53154

I also certify that I sent copies of the Finding of Violation by e-mail to:

Michael Szabo, Wisconsin Department of Natural Resources
Michael.szabo@wisconsin.gov

Marcia Hill, Wisconsin Department of Natural Resources
Marcia.hill@wisconsin.gov

On the 27th day of September 2018.

Kathy Jones
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7017 0530 0000 6289 1832